UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
v.	)	
	)	**Criminal No. 1:21-cr-00538-JMC**
RYAN SAMSEL,	)	
	)	
Defendant.	)	

MOTION TO JOIN OR ADOPT

Defendant Ryan Samsel, by and through the undersigned counsel, and pursuant to Rule 2 of the Federal Rules of Criminal Procedure, hereby respectfully requests this Court permit him to join and adopt the submissions of Defendants Johnson and Grant. (Dec. 29, 2023) (ECF Nos. 325, 327).

Specifically, in this case, the government adduced no evidence suggesting, let alone proving beyond a reasonable doubt, that any of the defendants, including Mr. Samsel, were aware that the Vice President, or any other Secret Service protectee was present at the Capitol Building on January 6, 2021. Indeed, with respect to Mr. Samsel, the government's *only* evidence of Mr. Samsel's *mens rea* was a text message concerning the result of the Georgia U.S. Senate runoffs.

[SIGNATURE ON NEXT PAGE]

Dated: December 29, 2023

Respectfully submitted,

/s/ Stanley E. Woodward, Jr.

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CERTIFICATE OF SERVICE

On December 29, 2023, the undersigned hereby certifies that a true and correct copy of the foregoing was electronically filed and served via the CM/ECF system, which automatically sends electronic notification of such filing to all registered parties.

/s/ Stanley E. Woodward, Jr.
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